May. 13. ZUID 1: DURM

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May 13, 2013

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VIA FACSIMILE (212) 805-4258

The Honorable Debra Freeman United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312 SO ORDERED:

DATE: 5/13/13

DEBRA FREEMAN

UNITED STATES MAGISTRATE JUDGE

RE:

Mosquea v. AMC Entertainment Inc. et al

Dear Magistrate Judge Freeman:

MEMO ENDORSED

We have been retained to represent defendant AMC Entertainment Inc. ("AMC") in the above-referenced case. So that the parties may continue their discussions about the possibility of settlement, we respectfully write to request a short extension, from May 13, 2013 to May 20, 2013, for AMC to answer and otherwise respond to the Complaint. Although the Court's docket reflects that process was served, AMC previously agreed to waive process, thus the May 13th deadline for answering and responsively pleading.

This is AMC's first request for an extension of time. Plaintiff's counsel, Mr. C.K. Lee, has been contacted about consenting to this request for an extension and he has no objection.

Since the Court has not yet issued a Scheduling Order, the requested extension is not expected to impact any other deadlines, and may, in fact, eliminate the need for a scheduling order.

] granted

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Thank you in advance of Your Honor's consideration of this request.

Respectfully submitted,

Aaron Warshaw

AW;tsf

cc: C.K. Lee, Esq. (by Facsimile) Mr. Patrick Hulla, Esq.

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